

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

GREGG SMITH,  
MICHAEL NOWAK,  
JEFFREY RUFFO, and  
CHRISTOPHER JORDAN,

Defendants.

Case No. 19-cr-00669

Hon. Edmond E. Chang

**DECLARATION OF JAMES J. BENJAMIN, JR. IN SUPPORT OF  
DEFENDANTS' MOTION *IN LIMINE* FOR A CAUTIONARY INSTRUCTION THAT  
COMPLIANCE POLICIES ARE DIFFERENT FROM LAW**

I, James J. Benjamin, Jr., counsel for Defendant Christopher Jordan, hereby declare and state as follows:

1. I respectfully submit this Declaration in support of Defendants' Motion *In Limine* For A Cautionary Instruction That Compliance Policies Are Different From Law.
2. Attached hereto as Exhibit A is an excerpt of a true and correct copy of the testimony of Armand Nakkab before the Federal Grand Jury on August 22, 2019 (DOJ-0019999626).
3. Attached hereto as Exhibit B is a true and correct copy of an FBI Form FD-302 dated September 3, 2019, relating to the interview of David King on July 23, 2019 (DOJ-0017117474).

I declare under penalty of perjury that, to the best of my knowledge, the foregoing statements are true and correct.

Dated: July 9, 2021  
New York, New York

/s/ James J. Benjamin, Jr.  
James J. Benjamin, Jr.  
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